

RHS:sls

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: **00-6279**

18 U.S.C. §1344

18 U.S.C. §2

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

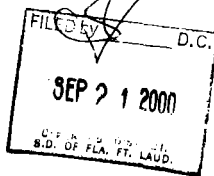
SHANNON GARRAUGHTY, )

a/k/a Tina Jacoby, )

Defendant. )

**CR-RYSKAMP**

**MAGISTRATE JUDGE  
JOHNSON**



**INDICTMENT**

The Grand Jury charges that:

**COUNTS I - X**

1. Between on or about December 28, 1999, and on or about December 30, 1999, in Broward, Palm Beach and Martin Counties, in the Southern District of Florida, the defendant,

**SHANNON GARRAUGHTY,  
a/k/a Tina Jacoby,**

did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain moneys under the custody and control of NationsBank, a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations and promises, in that the defendant, using a false identification under the name of Tina Jacoby, cashed counterfeit checks drawn on bank accounts of the Williams Island

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Property Owners Association and North Dade Chamber of Commerce.

**EXECUTIONS OF THE SCHEME**

2. On or about the dates listed below, in Broward, Palm Beach and Martin Counties, in the Southern District of Florida, the defendant,

**SHANNON GARRAUGHTY,  
a/k/a Tina Jacoby,**

did knowingly and willfully commit and cause to be committed the below enumerated acts, that is, the withdrawal of funds in the amounts listed, for the purpose of executing the scheme and artifice to defraud NationsBank:

Count	Date	Organization	Check Amount	NationsBank Branch
I	12/28/99	Williams Island Property Owners Association	\$995.82	Jupiter Square, Jupiter, Palm Beach County, FL
II.	12/28/99	Williams Island Property Owners Association	\$996.11	Tequesta Branch, Tequesta, Martin County, FL
III.	12/28/99	Williams Island Property Owners Association	\$4,896.80	Hobe Sound Banking Center, Hobe Sound, Martin County, FL.
IV.	12/29/99	North Dade Chamber of Commerce	\$995.77	Oriole Plaza Branch, Delray Beach, Palm Beach County, FL.
V.	12/29/99	North Dade Chamber of Commerce	\$995.82	West Lake Worth Branch, Lake Worth, Palm Beach County, FL.
VI.	12/29/99	North Dade Chamber of Commerce	\$996.35	Royal Palm Branch, Royal Palm Beach, Palm Beach County, FL.
VII.	12/30/99	North Dade Chamber of Commerce	\$998.17	Pine Trail Branch, West Palm Beach, Palm Beach County, FL.

VIII.	12/30/99	North Dade Chamber of Commerce	\$995.17	Crosstown Plaza Branch, West Palm Beach, Palm Beach County, FL.
IX.	12/30/99	North Dade Chamber of Commerce	\$995.82	North Coral Springs Branch, Coral Springs, Broward County, FL.
X.	12/30/99	North Dade Chamber of Commerce	\$995.16	Parkland Branch, Coconut Creek, Broward County, FL.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT XI**

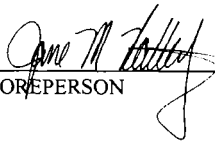
On or about January 21, 2000, at Broward County, in the Southern District of Florida, the defendant,

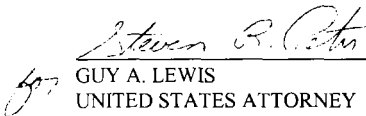
**SHANNON GARRAUGHTY,  
a/k/a Tina Jacoby,**

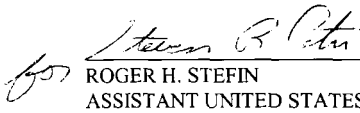
did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud and to obtain moneys under the custody and control of First Union National Bank, a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation (FDIC), by means of false and fraudulent pretenses, representations, and promises, in that the defendant withdrew \$40,000 from First Union National Bank accounts of one Shannon Bohannon, after a counterfeit

check in the amount of \$50,000 had been deposited into Shannon Bohannon's accounts; in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
GUY A. LEWIS  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ROGER H. STEFIN  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. \_\_\_\_\_

v.  
SHANNON GARRAUGHTY,  
a/k/a Tina Jacoby

## CERTIFICATE OF TRIAL ATTORNEY\*

## Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes \_\_\_\_ No \_\_\_\_  
Number of New Defendants \_\_\_\_  
Total number of counts \_\_\_\_\_\_\_\_ Miami \_\_\_\_ Key West  
☒ FTL \_\_\_\_ WPB \_\_\_\_ FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
- Interpreter: (Yes or No) NO  
List language and/or dialect ENGLISH

- This case will take 4 days for the parties to try.

- Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<input checked="" type="checkbox"/>
V	61 days and over	_____		

- Has this case been previously filed in this District Court? (Yes or No) no

If yes: Judge: \_\_\_\_\_ Case No. \_\_\_\_\_  
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) YES

If yes:  
Magistrate Case No. 00-4216-BSS  
Related Miscellaneous numbers: \_\_\_\_\_  
Defendant(s) in federal custody as of 9/11/00  
Defendant(s) in state custody as of \_\_\_\_\_  
Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) NO

- Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes ☒ No \_\_\_\_ If yes, was it pending in the Central Region? Yes \_\_\_\_ No \_\_\_\_
- Did this case originate in the Narcotics Section, Miami? Yes ☒ No \_\_\_\_

  
ROGER H. STEFIN  
ASSISTANT UNITED STATES ATTORNEY  
Florida Bar No.0287334

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
PENALTY SHEET

Defendant's Name: SHANNON GARRAUGHTY,  
a/k/a Tina Jacoby

No.: \_\_\_\_\_

Counts # I -XI  
BANK FRAUD

Title 18, U.S.C. § 1344

\*Max Penalty: Thirty (30) years' imprisonment; \$1,000,000 fine, each count

Count # :

\*Max Penalty:

Count # :

Max Penalty:

Count #19:

Max Penalty:

Count # 20:

Max Penalty:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.**